

# EXHIBIT B

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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : Hon. Michael A. Hammer  
:   
v. : Mag. No. 20-10059  
:   
JOSE TORRES : **CRIMINAL COMPLAINT**

I, Michael Scimeca, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation and that this complaint is based on the following facts:

SEE ATTACHMENT B

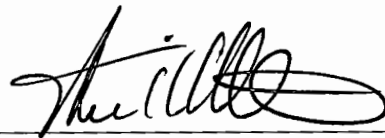
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Michael Scimeca, Special Agent  
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,  
February 13, 2020 at Newark, New Jersey

HONORABLE MICHAEL A. HAMMER  
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

**ATTACHMENT A**

**COUNT ONE**

In or around May 2015 in Middlesex County, in the District of New Jersey, and elsewhere, the defendant,

JOSE TORRES,

did knowingly persuade, induce, entice, and coerce an individual, namely Victim-1, to travel in interstate commerce, from the State of New York to the District of New Jersey, to engage in prostitution or in any sexual activity for which a person can be charged with a criminal offense; and attempted to do so.

In violation of Title 18, United States Code, Section 2422(a).

**COUNT TWO**

In or around October 2019 in Middlesex County, in the District of New Jersey, and elsewhere, the defendant,

JOSE TORRES,

did knowingly persuade, induce, entice, and coerce an individual, namely Victim-2, to travel in foreign commerce, from Canada to the District of New Jersey, to engage in prostitution or in any sexual activity for which a person can be charged with a criminal offense; and attempted to do so.

In violation of Title 18, United States Code, Section 2422(a).

**ATTACHMENT B**

I, Michael Scimeca, am a Special Agent with the Federal Bureau of Investigation. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with witnesses and other law enforcement officers, and my review of reports, documents, and items of evidence. Where statements of others are related herein, they are related in substance and in part. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. From in or around May 2015 to in or around October 2019, Jose Torres ("Torres") has been knowingly persuading, inducing, and enticing female commercial sex workers to travel in interstate or foreign commerce to engage in prostitution and other sexual activities by use of force, violence, and threats. Since at least 2015, Torres has lured female commercial sex workers from escort service websites to travel from out of state and/or out of the country to come to locations located in Middlesex County, New Jersey, and the surrounding area, for the purpose of engaging in prostitution with Torres. In each instance, Torres lures a female commercial sex worker to New Jersey with promises of large sums of payment. Additionally, in each instance, when the commercial sex worker asked for payment, Torres becomes aggressive, often assaulting and raping her. Moreover, Torres never pays them for their services.

2. During the investigation, law enforcement was able to identify and locate several of Torres' victims. For example, in or around May 2015, a commercial sex worker ("Victim-1") received a text message from Torres asking her to spend the night with him. Torres had found Victim-1 from her advertisement for prostitution services on Backpage.com, an internet based company that used to provide space for individuals to advertise services.<sup>1</sup> Victim-1's advertisement indicated that she was visiting New York City. Torres and Victim-1 agreed to meet, and Torres instructed Victim-1 to take a taxi from New York City to a specific location in New Jersey. Once at the location, Victim-1 got into Torres' vehicle and he drove her to a house located in Middlesex County. Once inside, Victim-1 asked for payment and Torres pretended to conduct a money transfer on his laptop. Subsequently, Torres and Victim-1 engaged in sexual activity. However, about an hour or so later, Victim-1 became uncomfortable due to Torres' aggressive behavior, and asked to leave. Torres refused, and continued to force Victim-1 to perform unwanted sexual activity, including slapping Victim-1 in the face and choking her. Victim-1 was fearful,

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<sup>1</sup> Law enforcement subsequently shut down Backpage.com.

and at times, complied with Torres' requests for her safety. The following morning, Victim-1 took a taxi back to New York and Torres never paid Victim-1.

3. In or around October 2019, Torres contacted another commercial sex worker ("Victim-2") via a telephone call. Torres indicated that he had seen her telephone number on an advertisement on another internet based company that offers space for individuals to advertise services, which indicated that she was located in Canada. Torres also told Victim-2 that it was not his first time dealing with a woman from Canada. Torres told Victim-2 that he was willing to pay her approximately \$20,000 to \$30,000 per month to fly to the United States at least twice a month to be his private escort. While Torres offered to purchase Victim-2's flight, Victim-2 opted to do it herself in order to not disclose her personal information and passport number. Victim-2 took an evening flight in or around October 2019 from Canada, that eventually landed in Newark, New Jersey, after a layover in Washington D.C. Upon her arrival, Torres met Victim-2 at the airport and drove her to a hotel in East Brunswick, New Jersey. Once they got to the hotel room, Victim-2 asked for payment and Torres became aggressive. When Victim-2 threatened to leave, Torres told her he was a police officer. Scared of the possible consequences of getting turned in, Victim-2 remained in the room and Torres then forced her to engage in rough sexual intercourse, which included slapping her in the face, choking her, and calling her derogatory names.

4. During the investigation, law enforcement learned that Torres has victimized other commercial sex workers in a similar fashion. Law enforcement recently intercepted a victim in a different district.